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10 Attorneys for Defendants  
SPORTS MEDIA SERVICES, LLC  
11 (ERRONEOUSLY NAMED AND  
SERVED AS FOX CORPORATION),  
12 FOX SPORTS HOLDINGS, LLC, FOX  
SPORTS 1, LLC, FOX SPORTS 2, LLC,  
13 and FOX SPORTS PRODUCTIONS,  
LLC

14 UNITED STATES DISTRICT COURT

15 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

16 NOUSHIN FARAJI, individually, and  
17 on behalf of others similarly situated,

18 Plaintiff,

19 v.

20 FOX CORPORATION, a Delaware  
corporation, FOX SPORTS  
21 HOLDINGS, LLC, a Delaware limited  
liability company, FOX SPORTS 1,  
22 LLC, a Delaware limited liability  
company, FOX SPORTS 2, LLC, a  
23 Delaware limited liability company,  
FOX SPORTS PRODUCTIONS, LLC,  
24 a Delaware limited liability company,  
CHARLIE DIXON, an individual,  
25 SKIP BAYLESS, an individual, JOY  
TAYLOR, an individual, and DOES 1-  
26 25, inclusive,

27 Defendants.

Case No.  
LASC Case No. 25STCV00101

**DECLARATION OF JOY DURLAO  
IN SUPPORT OF DEFENDANT  
SPORTS MEDIA SERVICES,  
LLC'S (ERRONEOUSLY NAMED  
AND SERVED AS FOX  
CORPORATION)  
NOTICE OF REMOVAL OF  
ACTION**

*[Filed Concurrently with: Notice of  
Removal of Action; Corporate  
Disclosure Statement; Notice of  
Interested Parties; and Declaration of  
Michaela R. Goldstein in support of  
Defendant's Notice of Removal of  
Action]*

Complaint Filed: January 3, 2025  
Trial Date: None Set

**DECLARATION OF JOY DUMLAO**

I, Joy Dumlao, hereby declare as follows:

1. I am currently employed as a Senior Litigation Paralegal for Fox Corporation. I was originally hired by a Fox entity in December 2001 and became employed by Fox Corporation specifically in March 2019. I have personal knowledge of the facts set forth herein and such facts are known by me to be true and correct. If called as a witness, I could and would competently testify to these facts.

2. In the regular course of my job duties, I have access to employment-related documents for employees of Sports Media Services, LLC (“Sports Media”), a wholly-owned subsidiary of Fox Corporation. As part of this access, I have access to the personnel file for Plaintiff Noushin Faraji. Sports Media maintains personnel files for each of its California employees, including Ms. Faraji, in the regular course of its business. I reviewed Ms. Faraji’s personnel file and based on that review, I am aware that Ms. Faraji began her employment with Sports Media on August 18, 2013 as a freelance hair stylist. Based on my review, I am also aware that Ms. Faraji remains a current employee at Sports Media, eligible to accept new assignments. Ms. Faraji’s last day worked at Sports Media was August 2, 2024.

3. In my capacity as Senior Litigation Paralegal, I also have knowledge of the collective bargaining agreements (“CBAs”) that regulate the terms and conditions of work for union employees at Sports Media and I am familiar with the content of the agreements. Sports Media maintains copies of its CBAs in the regular course of its business and I have access to the CBAs in the regular course of my job duties. Since at least August 18, 2013 through the end of her employment, Plaintiff Noushin Faraji was a member of a union called the International Alliance of Theatrical Stage Employees, Moving Picture Technicians, Artists and Allied Crafts of the United States (“IATSE”). As a member of this union, Ms. Faraji’s employment was subject to a CBA negotiated between IATSE and Sports Media.

1 One version of the collective bargaining agreement applied to Ms. Faraji's  
2 employment from October 1, 2019 through September 30, 2022. A true and correct  
3 copy of that collective bargaining agreement is attached hereto and marked "**Exhibit**  
4 **A.**" A different version of the collective bargaining agreement applied to Ms.  
5 Faraji's employment from October 1, 2022 through September 30, 2026. A true and  
6 correct copy of that collective bargaining agreement is attached hereto and marked  
7 "**Exhibit B.**"

8  
9 I have read the foregoing declaration and I declare under penalty of perjury  
10 under the laws of the United States and the State of California that the foregoing is  
11 true and correct.

12 Executed on 1/29/2025 in Los Angeles, California.

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14 Signed by:

*Joy Dumlaos*  
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15 JOY DURLAO  
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